

**FEDERAL COMMUNICATIONS COMMISSION**  
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**WASHINGTON DC 20554**

**MEDIA BUREAU**  
**AUDIO DIVISION**  
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October 2, 2018

Colorado Radio Marketing, LLC  
P.O. Box 11657  
Aspen, CO 91612

Re: K299AC (FX), Glenwood Springs, CO  
Colorado Radio Marketing, LLC  
Facility Identification Number: 12346  
Special Temporary Authority  
BSTA-20181001AFV

Dear Licensee:

This is in reference to the request filed October 1, 2018 seeking Special Temporary Authority to operate from a different location because of a “loss of previous site” without explanation of the circumstances.

STA requests which involve a change in transmitter site must include four critical elements: (1) Loss of the licensed site must be beyond the licensee's control; (2) STA facilities must continue to provide service to the licensed community; (3) STA facilities must maintain, as closely as practicable, the licensed service area<sup>1</sup> without extending it; (4) STA facilities cannot involve the construction of towers intended for permanent use by the station requesting the STA.

The coordinates requested in the STA request are identical to the current licensed transmitter site coordinates. From this site, both the increased 0.150 kW ERP and the proposed higher antenna height (a 12 meter increase), would cause the 60 dBu service contour to be expanded in most directions. This is not acceptable under our STA processing criteria.

An additional inconsistency comes from Exhibit 12 of the STA request. That exhibit refers to the proposed transmitter site as that of the ‘102.3 FM translator’, presumably K272AI. K272AI is also licensed to Colorado Radio Marketing, LLC, but that translator is presently silent “due to equipment failure.” *See* silent station STA BLSTA-20180222AAK.<sup>2</sup> However, the proposed ERP fails similarly assuming use of K272AI’s licensed parameters. Nor do the antenna height parameters in the STA request come anywhere near K272AI’s licensed antenna heights.

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<sup>1</sup> For FM translators, the licensed 60 dBu contour. Changed service areas from construction permits or pending applications will not be considered in this analysis. An STA can be authorized to maintain existing, licensed 60 dBu coverage; an STA is not acceptable as a means to expand the licensed service area.

<sup>2</sup> The silent station STA for K272AI expired September 18, 2018, 1080 days after the March 22, 2018 grant date. No extension request is currently on file.

Given these errors and inconsistencies, this STA request IS DISMISSED. FM Translator K299AC may not be operated with anything other than its licensed parameters at the licensed tower site. The licensee must file FCC Form 349 seeking a construction permit to make changes to this facility.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dale Bickel". The signature is fluid and cursive, with the first name "Dale" and last name "Bickel" clearly distinguishable.

Dale Bickel  
Senior Engineer  
Audio Division  
Media Bureau

cc: JULIE@DASHINGANGELS.COM (via e-mail)